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*Attorneys for Plaintiff,
Rodney Hermanson*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RODNEY HERMANSON, an individual,

Plaintiff,

vs.

CENTURY NATIONAL INSURANCE
COMPANY, a foreign insurance company,
DOES 1-100, individuals, and ROES 1-100,
companies,,

Defendants.

Case No.: 2:19-cv-00656-RFB-GWF

**STIPULATION AND [proposed] ORDER
FOR LEAVE TO FILE AMENDED
COMPLAINT**

I. PROCEDURAL HISTORY

Plaintiff filed a Complaint in the Eighth Judicial District Court of the State of Nevada (hereinafter "state court") on March 21, 2019. Service of process was completed on March 26, 2019. On April 10, 2019, Plaintiff filed a First Amended Complaint as a matter of course pursuant to Nev. R. Civ. P. 15(a)(1). Plaintiff subsequently discovered that the First Amended Complaint contained a typographic error, and filed an Errata to First Amended Complaint. On April 16, 2019, before Plaintiff served the First Amended Complaint or Errata, Defendant filed ...

1 a Petition for Removal (ECF No. 1). The Petition for Removal did not reference or attach the
2 First Amended Complaint or Errata.

3 **II. STIPULATION**

4 Based upon the foregoing, and in order to establish a clear and simple record, the
5 Parties, by and through their undersigned counsel, hereby stipulate and agree to grant Plaintiff
6 leave to file a Second Amended Complaint (a proposed copy of which is attached hereto as
7 **Exhibit "1"**) directly with this Court.

8 DATED this 1st day of May 2019

9 HALL JAFFE & CLAYTON, LLP

10 

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19 *Attorneys for Plaintiff*

DATED this 1st day of May 2019

ATKIN WINNER & SHERROD

20 */s/ Lara L. Miller*

21 THOMAS E. WINNER, ESQ.

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27 1117 South Rancho Drive

28 Las Vegas, Nevada 89102

Attorneys for Defendant

ORDER

Based upon the foregoing, and good cause appearing therefor,

IT IS HEREBY ORDERED that Plaintiff shall be granted leave to file a Second
Amended Complaint.

DATED this 2nd day of May 2019.


UNITED STATES MAGISTRATE JUDGE